

1 Frank A. Balistreri
2 Attorney at Law
3 CSB #93338
4 105 West F Street, Suite 215
5 San Diego, CA 92101
6 Telephone:(619) 881-7487

7 Attorneys for Defendant, JOSE HEREDIA-GUZMAN

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE JEFFREY T. MILLER)

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSE HEREDIA-GUZMAN,

15 Defendant.
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17 _____

Case No.: 07-CR-3353-JTM

Date: 1/4/2008
Time: 11:00 a.m.

NOTICE OF MOTIONS AND
MOTIONS TO:

1) COMPEL DISCOVERY;
2) GRANT LEAVE TO FILE
FURTHER MOTIONS

18 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
19 LUELLA MENDOZA CALDITO, ASSISTANT UNITED STATES ATTORNEY:

20 PLEASE TAKE NOTICE that on Friday, January 4, 2008, before the Honorable
21 Jeffrey T. Miller, at 11:00 a.m., or as soon thereafter as counsel may be heard, the
22 defendant, JOSE HEREDIA-GUZMAN, by and through counsel, Frank A. Balistreri,
23 will ask this Court to issue an order granting the motions listed below.

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MOTIONS

The defendant, JOSE HEREDIA-GUZMAN by and through counsel, Frank A. Balistreri, asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes and local rules for an order to:

- 1) Compel Discovery;
- 2) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

s/Frank A. Balistreri

Dated: 12-20-2007

Frank A. Balistreri,
Attorney for Defendant,
JOSE HEREDIA-GUZMAN

CERTIFICATE OF SERVICE

I, Frank A. Balistreri, hereby certify to the best of my information and belief that by having e-filed the "NOTICE OF MOTIONS AND MOTIONS TO 1) COMPEL DISCOVERY, 2) GRANT LEAVE TO FILE FURTHER MOTIONS" and "MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANT'S MOTIONS." I have caused a copy of each to have been served via electronic mail upon each of the following:

Luella Mendoza Caldito Luella.Caldito@usdoj.gov, Diana.ortiz@usdoj.gov,
Efile.dkt.gcl@usdoj.gov

Zandra Lopez zll@zandralopezlaw.com

Joseph Milchen JMilchen@cox.net, HBFANDJM@AOL.COM

U S Attorney CR Efile.dkt.gc2@usdoj.gov

s/Frank A. Balistreri

Dated: 12-20-2007

Frank A. Balistreri,
Attorney for JOSE HEREDIA-GUZMAN